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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 **SHENDONNA SOPHIA McLAIN**,

14 Plaintiff,

15 v.

16 **CLARK COUNTY, NEVADA; et. al.**,

17 Defendants.

18 } Case No. 2:14-cv-0288-JAD-GWF

19 } **Order Granting Stipulation for**
20 } **Extension of Time**

21 } [ECF No. 120]

22 **STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO**
23 **RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

24 } **(FIFTH REQUEST)**

25 Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of

26 Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current
deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and
#110) to and until May 30, 2017 (Tuesday). This is the parties' fifth request for an extension of
time. Plaintiff's current deadline is May 23, 2017.

27 In support of this stipulation, the parties wish to advise the Court of the following:

28 1. This is a civil rights case involving five separate Defendants. Each
29 Defendant moved for summary judgment on January 30, 2017.

1 2. Plaintiff's counsel, Paul S. Padda, Esq. recently requested (via joint
2 stipulation) an extension of time which the Court approved. Unfortunately, Mr. Padda became ill
3 late last week and has had very limited involvement in office matters since that time.
4 Undersigned counsel for Plaintiff spoke to Mr. Padda today who continues to experience illness
5 and is expected away from the office for part of this week in an effort to recuperate. Due to
6 undersigned counsel's limited involvement in this case, he is not in a position to complete
7 Plaintiff's response to the pending motions for summary judgment.

8 3. Upon learning of the current deadline, undersigned counsel immediately
9 contacted counsel for Defendants have graciously indicated that they do not oppose Plaintiff's
10 request for additional time to respond to the dispositive motions provided they are allowed 30-
11 days to file a reply to any response that may be filed by Plaintiff. Obviously, Plaintiff's counsel
12 has no issue with providing Defendants additional time to file replies.

13 4. The additional time requested herein should provide sufficient time for
14 Plaintiff's counsel to complete and file appropriate responses after he recovers from illness and is
15 able to return to the office on regular schedule.

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5. The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Lucinda L. Cormier

/s/ Joshua Y. Ang

Lucinda L. Coumou, Esq.
Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Joshua Y. Ang, Esq.
Paul Padda Law

Dated: May 23, 2017

Attorney for Plaintiff

/s/ Noel E. Eidsmore

Robert W. Freeman, Jr., Esq.
Noel E. Eidsmore, Esq.
Lewis Brisbois Bisgaard & Smith

Attorney for Officers Friedman and Zaccara
and the Las Vegas Metropolitan Police Department

Dated: May 23, 2017

IT IS SO ORDERED:

The Court hereby approves the parties' stipulation for extension of the current deadline for responding to the motions for summary judgment filed on January 30, 2017 (Pacer #109 and #110). Plaintiff's responses shall be due on or before May 30, 2017 and each Defendant shall have 30-days after Plaintiff files a response to submit a reply (if any).

UNITED STATES DISTRICT JUDGE

Dated: May 24, 2017